

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

**STRAGENT, LLC and SEESAW  
FOUNDATION,**

**Plaintiffs**

**vs.**

**INTEL CORPORATION,**

**Defendant.**

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**CIVIL ACTION NO. 6:11-CV-421**

**DECLARATION OF COUNSEL IN SUPPORT OF INTEL'S MOTION TO  
RECOVER ATTORNEYS' FEES**

I am an attorney for Intel Corporation in this matter. I submit this declaration in support of Intel's Motion to Recover Attorneys' Fees. I have personal knowledge of the facts stated below and, if called on to do so, would testify competently thereto.

1. Attached as Exhibit A to the accompanying Index of Sealed Attachment to Intel's Motion to Recover Attorneys' Fees is a true and correct copy of excerpts of Plaintiffs' Amended and Supplemental Objections and Responses to Intel's Interrogatories Nos. 2-3, 6-9, and 12-17, dated September 16, 2013.

2. Attached as Exhibit B is a true and correct copy of the results of a PACER search conducted on April 10, 2014, for cases in which Stragent, LLC has been a party.

3. Attached as Exhibit C is a true and correct copy of an email from Jaime Olin to Tyler Bowen dated July 17, 2012.

4. Attached as Exhibit D is a true and correct copy of an email from Jaime Olin dated February 7, 2014.

5. In this case, Stragent produced 63,274 pages of documents, and Intel produced 802,397 pages. Stragent used fewer than 0.5% of the pages produced by Intel as trial exhibits that were entered into evidence.

6. Stragent took more than 25 depositions of Intel employees, totaling over 80 hours.

7. Attached as Exhibit E is a true and correct copy of the Action Closing Prosecution for U.S. Patent 6,848,072, dated August 9, 2013.

8. Attached as Exhibit F is a true and correct copy of the Action Closing Prosecution for U.S. Patent 7,028,244, dated August 15, 2013.

9. Attached as Exhibit G is a true and correct copy of the Action Closing Prosecution for U.S. Patent 7,320,102, dated August 8, 2013.

10. Attached as Exhibit H are true and correct copies of the Decisions Denying Petitions to Withdraw the Action Closing Prosecution for U.S. Patent 6,848,072, dated January 10, 2014, January 27, 2014, and February 12, 2014.

11. Attached as Exhibit I are true and correct copies of the Decisions Denying Petitions to Withdraw the Action Closing Prosecution for U.S. Patent 7,028,244, dated January 8, 2014, January 27, 2014, and February 20, 2014.

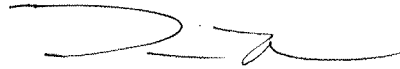
12. Attached as Exhibit J are true and correct copies of the Decisions Denying Petitions to Withdraw the Action Closing Prosecution for U.S. Patent 7,320,102 dated January 8, 2014, and February 20, 2014.

13. Attached as Exhibit K is a true and correct copy of a redline comparing the proposed amended and supplemental Infringement Contentions Stragent served on August 16, 2013, to those it had served on July 29, 2013.

14. Attached as Exhibit L is a true and correct copy of the Final Office Action for Claims 16 and 23-85 of U.S. Patent 6,848,072, dated April 9, 2014.

I declare under penalty of perjury of the laws States that, to the best of my knowledge and belief, the foregoing is true and correct.

Dated: April 10, 2014

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Timothy J. Franks